



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
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August 17, 2000

Ref: 8EPR-EP

Mr. Jonathan D. Farthing
Chief, Environmental Analysis Division
HQ AFCHEE/ECA
3207 North Road
Brooks AFB, TX 78235-5363

Re: Warren AFB Peacekeeper Missile
Dismantle/Deactivation, DEIS Review #000
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Dear Mr. Farthing:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region 8 Office of the Environmental Protection Agency (EPA) has reviewed the *Draft Environmental Impact Statement (DEIS) for the Peacekeeper Missile System Dismantlement/Deactivation, at F. E. Warren AFB, Wyoming*, dated June 2000. We offer the following concerns and comments for your consideration as you complete the Final Environmental Impact Statement (FEIS). EPA's comments are listed below.

1. Sections 3.4.2.4.1 and 3.4.2.4.2, General – Much of the information provided here is very general in nature, e.g., statements are made regarding statewide water quality trends. An effort should be made to provide at least regional water quality information. It is recommended that the FEIS address water quality in the area of concern.
2. Geological Resources, Mitigation Measures Section 4.4.1.5, Page 4-45 – We recommend that several of the mitigation measures discussed in the geological resources section be incorporated into the mitigation measures. Specifically, Section 4.4.1.2.2 Geology, last paragraph, page 4-40, states that “as a best management practice the contractor could perform a survey of subsurface structures within 2000 feet of a LF prior to commencing dismantlement activities.” In the same paragraph it is stated that “a post-blast survey could be done to determine whether explosive demolition affected the structure.” Both of these mitigation measures seem appropriate for implementation, yet the suggested measures were not carried forward nor were the measures discussed and dismissed elsewhere in the DEIS. Where there are subsurface structures within 2000 feet of explosive demolition, we recommend surveying the subsurface structures before and after the blast, particularly where those subsurface structures could impact ground water.

3. Section 4.4.2.2.1, Page 4-49 – We have concerns about the successful long term closure of wells in the vicinity of facilities demolished through explosions. For example, will the unused water-supply wells at the missile alert facilities be properly abandoned before or after any explosive demolitions occur at launch facilities in the vicinity? The concern is the potential for damage from explosions to the integrity of recently abandoned water-supply wells. Damage to properly abandoned wells can provide a vertical conduit between aquifers of varying water quality. It is recommended that this issue be addressed in the FEIS.
4. Section 4.3.2.4 Above Ground and Underground Storage Tanks, Page 4-33 & 34 – It is not clear from the section, whether shallow-buried diesel tanks without asbestos or PCB contamination will be removed or closed in place. We recommend that all tanks be removed where feasible.
5. We appreciate the Air Force's plans to reuse and recycle hazardous materials that are removed from the facilities prior to implosion.
6. Are there any plans to dismantle or deactivate any of the Minuteman missile system surrounding Warren Air Force Base? If such plans are under development, the potential impacts should be discussed in a cumulative impact section of the FEIS.
7. Page E-7, Map of Flight R – It appears that this map is inaccurate. The town depicted as Wheatland is actually Chugwater.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the Preferred Alternative identified by the DEIS for the *Peacekeeper Missile System Dismantlement/Deactivation, at F. E. Warren AFB* will be listed in the Federal Register in the category EC-2. This means that the review has identified environmental impacts that should be avoided in order to fully protect the environment, and the DEIS does not contain sufficient information to thoroughly assess environmental impacts that should be avoided to fully protect the environment. Enclosed is a summary of EPA's rating definitions. EPA also notes the improvements in the environmental impact analysis for missile system deactivation and dismantlement. The quality of the information in this EIS is an improvement over previous deactivation activities at Ellsworth and Grand Forks Air Force Bases.

We appreciate your interest in our comments. Please contact Dana Allen at (303) 312-6870 if you have any questions about these comments.

Sincerely,

Original Signed by

Cynthia Cody
Chief, NEPA Unit
Office of Ecosystems Protection
and Remediation

Enclosure

cc: Marguerite Duffy, EPA HQ